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January 27, 2023

VIA ECF

Honorable Ona T. Wang
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

**Re: *Adam Potter v. Beacon Intercontinental Group, Inc., et al.*, No. 1:20-cv-04599-JGK-OTW
Letter-Motion to File Reply in Further Support of Discovery Motion Under Seal**

Dear Judge Wang:

We write on behalf of Adam Potter (“Potter”) pursuant to Paragraph III(d) and IV of Your Honor’s Individual Procedures, and Local Rule 5.2, for permission to file under seal the reply memorandum of law in further support of Potter’s January 6, 2023 discovery motion.

At a December 13, 2022 pre-motion conference, Your Honor permitted Potter to file a motion to compel and to reduce the confidentiality designations of certain documents under the operative protective order entered in this case (the “Motion”). *See* Tr. at 59:17-18.¹ Moreover, Your Honor also instructed Potter to file the supporting materials *provisionally under seal* because the Motion challenges in part certain confidentiality designations made by Defendants/Counterclaim Plaintiffs Beacon Intercontinental Group, Inc. and Business Insurance Holdings, Inc. *Id.* at 59:25-60:2-19, 64:2-10.

Thank you for Your Honor’s time and attention to this matter.

Respectfully Submitted,

John A. Wait

¹ A copy of the transcript from the December 13, 2022 conference is attached as Exhibit K to the Declaration of John A. Wait submitted in connection with the Motion.